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2
3 **IN THE UNITED STATES BANKRUPTCY COURT**
4 **FOR THE DISTRICT OF PUERTO RICO**
5

6 In re; Carlos Beltran, et al)
7)
8)
9)
10)
11)
12)

Case No.: 09-bk-06437

13 **MOTION IN COMPLIANCE AND SUBMITTING LIQUIDATION ANALYSIS**
14

15 **COMES NOW** Petitioner –through counsel- moves pursuant to Rule 3016 and Rule 3019
16 moves this Honorable Court in compliance with Rule 3016 and 3019 to submit the
17 liquidation analysis as an exhibit to the Disclosure Statement and Reorganization Plan. In
18 support the appearing petitioner states and prays as follows:
19

20 **PROCEDURAL HISOTRY**

- 21 1. The parties herewith have submitted a disclosure statement and reorganization
22 plan.
23 2. One creditor has objected due to the lack of a liquidation analysis. The same is
24 submitted as exhibit to this motion in compliance.
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WHEREFORE the appearing parties respectfully pray to this court to take notice of the same and accept the filing herewith as the liquidation analysis under the submitted plan.

The Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on this day I personally filed this pleading in the court's ECF/CM electronic case management system that will serve an electronic copy to all counsel of record. And

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EXHIBIT A